

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CONTIGUITY LLC,

Plaintiff,

v.

HIKVISION USA, INC.,

Defendant.

Case No. 3:23-cv-00160

Patent Case

JURY TRIAL DEMANDED

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO THE SECOND AMENDED COMPLAINT**

Defendant Hikvision USA, Inc. (“Hikvision”) respectfully files this unopposed motion requesting that the Court extend the deadline for Hikvision to answer or otherwise respond to Plaintiff’s Second Amended Complaint for Patent Infringement (Doc. No. 44) (the “Second Amended Complaint”).

The Court vacated the final judgment in this matter and granted Plaintiff leave to file a Second Amended Complaint (Doc. No. 43), which Plaintiff filed on March 8, 2024 (Doc. No. 44) and which was served to Hikvision on March 11, 2024. Hikvision’s current deadline to respond to the Second Amended Complaint would be March 25, 2024.¹

The parties have agreed to an additional extension of the deadline for Hikvision to answer or otherwise respond to the Second Amended Complaint for 14 days, up to and including April 8, 2024. The request is Hikvision’s first request for an extension of time regarding the Second Amended Complaint and is not sought for the purposes of delay but so that justice may be done.

¹ Hikvision’s current deadline to respond is calculated as fourteen days from the date of service of the Second Amended Complaint, which took place through the Court’s electronic case filing system on March 11, 2024.

Accordingly, Hikvision respectfully requests that the Court extend Hikvision's deadline to answer or otherwise respond to the Second Amended Complaint up to, and including, April 8, 2024.

Dated: March 15, 2024

Respectfully submitted,

/s/ Keith B. Davis

Keith B. Davis

Texas State Bar No. 24037895

JONES DAY

2727 North Harwood Street

Dallas, TX 75201.1515

Telephone: +1.214.220.3939

Facsimile: +1.214.969.5100

*ATTORNEY FOR DEFENDANT HIKVISION
USA, INC.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 15, 2024, the foregoing document was electronically submitted with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Keith B. Davis
Keith B. Davis

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on March 14, 2024, Defendant's counsel conferred with William Ramey III, counsel for Plaintiff, regarding the relief requested herein. Plaintiff's counsel does not oppose the relief requested herein.

/s/ Keith B. Davis
Keith B. Davis